

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CHAPTER 13**

**DOMINICK TALARICO A/K/A  
DOMINICK JOSEPH TALARICO,  
(Debtor(s))**

**CASE NO. 5-17-bk-2412-JJT**

---

**MOTION TO ATTACH WAGES**

**AND NOW** this 26<sup>th</sup> day of October, 2017, comes the debtor(s) Dominick Talarico, a/k/a Dominick Joseph Talarico, by and through his attorney, Raymond W. Ferrario, and respectfully represents:

(1) The debtor(s) filed a Chapter 13 petition on June 8, 2017.

(2) The debtor(s) filed an amended Chapter 13 Plan.

(3) The debtor(s) receives regular income from employment with Stadium International Sales & Service which may be attached under 11 U.S.C. §1326 to fund the Chapter 13 Plan.

(4) The likelihood of success in this case will increase if the Motion for Wage Attachment is granted.

(5) The debtor(s) Dominick Talarico, a/k/a Dominick Joseph Talarico consents to the wage attachment.

**WHEREFORE**, the debtor(s) respectfully requests that this Court enter an Order directing the above mentioned employer to pay Trustee in the amount set forth in the

attached Order.

Respectfully submitted,  
RAYMOND W. FERRARIO, P.C.

by: 

Raymond W. Ferrario  
Attorney for Debtor(s)  
Suite 528, Scranton Life Bldg., 538 Spruce Street  
Scranton, PA 18503-1816  
TEL (570) 963-7878  
FAX (570) 963-7850  
E-mail: raymondwferrariopc@comcast.net

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

CHAPTER 13

DOMINICK TALARICO A/K/A  
DOMINICK JOSEPH TALARICO,  
(Debtor(s))

CASE NO. 5-17-bk-2412-JJT

**DEBTOR(S) CONSENT TO VOLUNTARY**  
**WAGE ATTACHMENT**

I, Dominick Talarico, aka Dominick Joseph Talarico, hereby consent to an attachment of my wages for the purpose of funding my Chapter 13 Plan.

Dated

10/26/17

Debtor



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CHAPTER 13**

**DOMINICK TALARICO A/K/A  
DOMINICK JOSEPH TALARICO,  
(Debtor(s))**

**CASE NO. 5-17-bk-2412-JJT**

---

**ORDER TO PAY TRUSTEE**

Upon consideration of the above referenced debtor(s) having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

**IT IS HEREBY ORDERED** that until further Order of this Court:

Employer,     Stadium International Sales & Service  
Attn:           Payroll Department  
Address:       23285 State Route 342  
                 Watertown, NY 13601  
                 Phone #: (315) 779-1960

shall deduct from said debtor's income the sum of \$806.53 from each bi-weekly pay check, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above debtor and to remit the deducted sums to:

CHARLES J. DE HART, III  
STANDING CHAPTER 13 TRUSTEE  
P. O. 7005  
LANCASTER, PA 17604

**IT IS FURTHER ORDERED** that checks issued to the Trustee pursuant to this Order shall include the above-captioned case number on the face of the check.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

CHAPTER 13

**DOMINICK TALARICO A/K/A  
DOMINICK JOSEPH TALARICO,  
(Debtor(s))**

**CASE NO. 5-17-bk-2412-JJT**

---

**CERTIFICATE OF SERVICE**

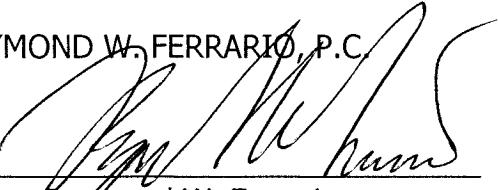
**AND NOW** this 26 day of October, 2017, I hereby certify that the Chapter 13 Trustee and U.S. Trustee has been served a copy of this Motion electronically at the below address:

CHARLES J. DeHART, III  
STANDING CHAPTER 13 TRUSTEE  
[dehartstaff@pamd13trustee.com](mailto:dehartstaff@pamd13trustee.com),[harrisburgecf@ramapo.com](mailto:harrisburgecf@ramapo.com);[harrecf@ramapo.com](mailto:harrecf@ramapo.com)

United States Trustee  
[ustregion03.ha.ecf@usdoj.gov](mailto:ustregion03.ha.ecf@usdoj.gov)

John Fisher, Esquire  
126 South Main Street  
Pittston, PA 18640  
*Via e-mail: fisherlawoffice@yahoo.com*

RAYMOND W. FERRARIO, P.C.

by: 

Raymond W. Ferrario  
Attorney for Debtor(s)  
Suite 528 Scranton Life Building  
538 Spruce Street  
Scranton, PA 18503-1816  
TEL: (570) 963-7878  
FAX: (570) 963-7850